

Reagan E. Bradford, OBA #22072\*  
Ryan K. Wilson, OBA #33306\*  
\*admitted *pro hac vice*  
BRADFORD & WILSON PLLC  
431 W. Main Street, Suite D  
Oklahoma City, OK 73102  
(405) 698-2770  
(405) 234-5506 fax  
[reagan@bradwil.com](mailto:reagan@bradwil.com)  
[ryan@bradwil.com](mailto:ryan@bradwil.com)

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF WYOMING**

Madeline A. Wright, on behalf of herself  
and all others similarly situated,

Plaintiff,

v.

Civil Action No. 22-CV-213-KHR

Devon Energy Production Company, L.P.,

Defendant.

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**PLAINTIFF'S UNOPPOSED MOTION  
TO CERTIFY THE SETTLEMENT CLASS FOR SETTLEMENT PURPOSES,  
TO PRELIMINARILY APPROVE THE CLASS ACTION SETTLEMENT,  
TO APPROVE THE FORM AND MANNER OF NOTICE,  
TO APPOINT A SETTLEMENT ADMINISTRATOR,  
TO APPOINT AN ESCROW AGENT, AND  
TO SET A DATE FOR A FINAL APPROVAL HEARING**

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Plaintiff respectfully moves the Court, under Federal Rule of Civil Procedure 23, to certify the Settlement Class, to preliminarily approve the Class Action Settlement, to approve the form and manner of notice to the Settlement Class, to appoint a Settlement Administrator, to appoint an Escrow Agent, and to set a date for a final fairness hearing. Plaintiff provides the grounds for the relief requested in this Motion in the accompanying brief in support. Plain-

tiff and Defendant have executed a Settlement Agreement, which is attached hereto as **Exhibit 1**, in which they, *inter alia*, agreed to the form of the Preliminary Approval Order. *See id.* at 46–60. For the Court’s convenience, Plaintiff separately attaches that agreed Preliminary Approval Order here as **Exhibit 2**, and Plaintiff will also submit a Word version of agreed Preliminary Approval Order to the Court contemporaneously with filing this Motion.

Respectfully Submitted,

/s/ Reagan E. Bradford

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(405) 234-5506 fax

reagan@bradwil.com

ryan@bradwil.com

*–and–*

Rick Erb 6-2663

RICHARD A. ERB, JR., PC

PO Box 36

Gillette, WY 82717

(307) 682-0215

(307) 682-1339 fax

rick@rickerb.com

**COUNSEL FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 5, 2024, a true and correct copy of the above and foregoing document was served in accordance with the Local Rules on all counsel of record via the Court’s electronic filing system.

/s/ Reagan E. Bradford

Reagan E. Bradford